

GIBBONS P.C.

Robert K. Malone, Esq.
David N. Crapo, Esq.
Kyle P. McEvilly, Esq.
One Gateway Center
Newark, New Jersey 07102
(973) 596-4500
rmalone@gibbonslaw.com
dcrapo@gibbonslaw.com
kmcevilly@gibbonslaw.com

*Attorneys for the States of
New Mexico and Mississippi*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**NOTICE OF MOTION OF THE STATE OF NEW MEXICO AND THE STATE OF
MISSISSIPPI TO DISMISS THE SECOND BANKRUPTCY PETITION OF LTL
MANAGEMENT LLC FOR CAUSE, PURSUANT TO SECTION 1112(B) OF THE
UNITED STATES BANKRUPTCY CODE (11 U.S.C. §§ 101, *ET SEQ.*), AND JOINDER
IN MOTIONS TO DISMISS FILED BY CERTAIN OTHER PARTIES**

PLEASE TAKE NOTICE that the States of New Mexico and Mississippi (collectively, the “**States**”), by and through their undersigned counsel, Gibbons P.C., hereby move for entry of an order by way of the *Motion of the State of New Mexico and the State of Mississippi to Dismiss the Second Bankruptcy Petition of LTL Management LLC for Cause, Pursuant to Section 1112(b) of the United States Bankruptcy Code (11 U.S.C. §§ 101, et seq.), and Joinder in Motions to Dismiss Filed by Certain Other Parties* (the “**Motion**”) before the United States Bankruptcy Court for the District of New Jersey (the “**Bankruptcy Court**”).

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief sought in the Motion will be held on **June 15, 2023 at 10:00 a.m. (EDT) or at such other time to be established by the Court** (the “**Hearing**”) before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the District of New Jersey, in Courtroom #8 at the United States Bankruptcy Court for the District of New Jersey, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608.

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, objections, if any, to the entry of an order approving the Motion must be (a) in writing and served on or before **June 8, 2023** (the “**Objection Deadline**”); (b) filed with the Clerk of the Bankruptcy Court; and (c) served simultaneously upon Gibbons P.C., One Gateway Center, Newark, New Jersey 07102 (Attn: Robert K. Malone, Esq.) so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that only objections made in writing and timely filed and served, in accordance with the procedures above, will be considered by the Bankruptcy Court at the Hearing.

Dated: May 10, 2023
Newark, NJ

GIBBONS P.C.

By: /s/ Robert K. Malone
Robert K. Malone, Esq.
David N. Crapo, Esq.
Kyle P. McEvilly, Esq.
One Gateway Center
Newark, New Jersey 07102
(973) 596-4500
rmalone@gibbonslaw.com
dcrapo@gibbonslaw.com
kmcevilly@gibbonslaw.com

*Attorneys for the States of
New Mexico and Mississippi*